IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF OKLAHOMA

| BOARD OF COUNTY COMMISSIONERS OF THE COUNTY OF CLEVELAND, |) | |
|---|---|-------------------------|
| Plaintiff, |) | |
| |) | Case No. CIV-12-00569-F |
| vs. |) | |
| |) | |
| MERSCORP, INC., et al., |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF'S MOTION FOR LEAVE TO FILE A CORRECTED BRIEF IN SUPPORT OF ITS MOTION TO REMAND

Plaintiff, Cleveland County, in the name of the Board of County Commissioners of the County of Cleveland, respectfully moves this Court for leave to file a corrected brief in support of its motion to remand this action to state court, pursuant to 28 U.S.C. § 1447. In accordance with the parties' Stipulated Scheduling Order that was granted by this Court on June 4, 2012 (ECF No. 14), Plaintiff timely filed its motion to remand and brief in support on June 20, 2012 (ECF No. 32).

RELIEF REQUESTED

Plaintiff respectfully moves this Court for permission to file the attached corrected brief in support of its motion to remand in order to correct typographical and formatting errors arising from a clerical issue, with such corrections reflected in the table of contents, table of authorities, and corresponding citations, and with such minor edits

reflected in corresponding portions of the motion to remand and supporting declaration. As stated above, all corrections are intended only as minor edits to typographical and formatting errors in Plaintiff's timely remand filings without any alteration to the substance or purpose. Defense counsel do not oppose this motion.

Dated: June 26, 2012

New York, New York

Respectfully submitted,

s/ Christian Siebott

Stanley D. Bernstein (admitted *pro hac vice*) Christian Siebott (admitted *pro hac vice*) Sara P. Goodman (admitted *pro hac vice*)

BERNSTEIN LIEBHARD LLP

10 East 40th Street New York, NY 10016 Telephone: (212) 779-1414

Fax: (212) 779-3218 sbernstein@bernlieb.com csiebott@bernlieb.com sgoodman@bernlieb.com

and

Stanley M. Ward, OBA # 9351 R. Ben Houston, OBA #14751 WARD & GLASS, LLP 1821 East Imhoff Road, Suite 102 Norman, Oklahoma 73071 Telephone: (405) 360-9700 Fax: (405) 360-7902

Fax: (405) 360-7902 ben@wardglasslaw.com

Attorneys for Plaintiff Cleveland County, in the name of Board of County Commissioners of the County of Cleveland

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2012, I electronically transmitted Plaintiff's Motion for Leave to File a Corrected Brief in Support of its Motion to Remand with the Clerk of Court using the CM/ECF System for filing, which will then transmit a notification of such filing to counsel of record.

s/ Christian Siebott CHRISTIAN SIEBOTT